

MEMORANDUM

SUBJECT: Cruise Ship Identification Numbers and State Required Annual Reporting Components

FROM: Elizabeth Cotsworth, Director
Office of Solid Waste

TO: RCRA Senior Policy Managers
Regions 1-10

Over the last several months, the Environmental Protection Agency (EPA), Office of Solid Waste has been working with Region 4, Region 9, Region 10, and ten states having cruise ship traffic to facilitate national acceptance of one EPA hazardous waste identification (ID) number per individual cruise ship. This came about because the ships were receiving different numbers from each state in which hazardous waste was off-loaded. Having multiple identification numbers causes the ships to create and maintain duplicate copies of hazardous waste management records, leading to an increased paperwork burden.

Through meetings and conference calls, the participants on this project reached an agreement on the issue. Today, we are asking that individual cruise ships be assigned only one EPA hazardous waste identification number as a generator of hazardous waste for purposes of the Resource Conservation and Recovery Act. The following procedures would apply:

- a) A cruise ship would determine its American-based home port state (the state in which it has corporate offices or its main port of call).
- b) After determining the home port state, the cruise line will notify the selected state or corresponding EPA regional office of its hazardous waste activities.
- c) The cruise ship will identify its hazardous waste generator size in accordance with 40 CFR 261.5(c).
- d) The home port state or EPA regional office will issue an EPA hazardous waste identification number for each individual cruise ship using the current established procedure. The number will reflect the home port state initials and ten alphanumeric characters.

We are recommending that the state or region consider using a ship's registry number,

which is known as the International Maritime Organization (IMO) number, as part of the EPA hazardous waste identification number. The IMO number is generally a five to seven digit number; zeros can be added before or after the number to reach the ten characters required for the EPA hazardous waste identification number. Using the IMO number will allow for coordination with the Coast Guard, as this is the number they use most often.

After the identification number is assigned, it will remain with that ship and be used on all hazardous waste manifests regardless of where the waste is off-loaded in the U.S. The assignment of the EPA ID number will not impact the applicability of state-specific RCRA requirements. For example, when waste is off-loaded in a state, the cruise ship will comply with that particular state's RCRA requirements whether or not that state assigned the ID number. The ship will be required to provide records to the individual state as required by state law.

Many of the states who will not be issuing the ID number expressed an interest in obtaining information provided by the cruise ship in either an annual or biennial report to its home port state. This request for annual report information can be addressed through the existing Biennial Reporting System (BRS). The attachment to this memo provides more specific information on how the ID numbers and annual reports will be incorporated into the EPA's BRS databases.

If you have any questions, please contact Teena Wooten at (703) 308-8751.

Attachment (1)

cc: Key RCRA Contacts, Regions 1 - 10
RCRA Enforcement Contacts, Regions 1 - 10
RCRA Data Management Contacts, Regions 1-10
Tom Kennedy, Association of State and Territorial Solid Waste
Management Officials (ASTSWMO)
Anne Dobbs, Texas Natural Resource Conservation Commission (TNRCC)